UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

STEVEN PLAVIN, on behalf of himself and all others similarly situated,	:	
Plaintiff,	:	No. 3:17-cv-01462-RDM
v. GROUP HEALTH INCORPORATED,	:	Judge Robert D. Mariani Electronically Filed
Defendant.	:	ziewieniemity i neu
	:	
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DEFENDANT GROUP HEALTH INCORPORATED'S UNOPPOSED MOTION TO EXTEND PAGE LIMITATIONS ON SUPPORTING BRIEF

Defendant, Group Health Incorporated ("GHI"), by and through counsel, hereby moves pursuant to Local Rule of Court ("LR") 7.8(b)(3) for leave to file a brief in excess of the page limitation established in LR 7.8(b)(1) and, in support thereof, avers as follows:

- 1. Plaintiff completed service of its Complaint upon GHI on or about August 18, 2017 by personal service.
- 2. By Order dated September 8, 2017, GHI has until October 6, 2017, to answer, plead, or move in response to the Complaint.

- 3. Plaintiff's 21-page class action Complaint asserts four separate causes of action purportedly arising from the operation of a GHI health insurance plan offered to New York City employees and retirees.
 - 4. GHI intends to move to dismiss Plaintiff's Complaint in its entirety.
- 5. To adequately address the numerous and independent grounds for dismissing each of the four causes of action asserted in Plaintiff's Complaint, GHI's supporting brief would exceed the 15-page or 5,000 word limitations imposed by LR 7.8(b).
- 6. GHI therefore respectfully requests leave to file a brief in support of its forthcoming motion to dismiss of no longer than 26 pages.
- 7. Counsel for GHI has conferred with counsel for Plaintiff, who has no opposition to the relief sought in this Motion.

WHEREFORE, GHI respectfully requests that the Court grants this
Unopposed Motion to Extend Page Limitations on Supporting Brief and grant GHI
leave to file a supporting brief of no longer that 26 pages.

DEBEVOISE & PLIMPTON LLP

John Gleeson*
Maura K. Monaghan*
Jared I. Kagan*
Eric W. Shannon*
919 Third Avenue
New York, NY 10022
(212) 909-6000

*pro hac vice motions pending

Dated: September 29, 2017

LeVAN LAW GROUP LLC

By: /s/ Peter H. LeVan, Jr.
Peter H. LeVan, Jr.
One Logan Square – 27th Floor 18th & Cherry Streets
Philadelphia, PA 19103
(215) 561-1500
plevan@levanlawgroup.com

Attorneys for Defendant Group Health Incorporated

CERTIFICATE REGARDING CONCURRENCE

I certify that by email dated September 27, 2017, my co-counsel sought concurrence from counsel for Plaintiff in this Motion. By email dated September 29, 2017, counsel for Plaintiff stated that Plaintiff had no opposition to GHI's request for an extension of the page limitations sought in this Motion.

/s/ Peter H. LeVan, Jr.

CERTIFICATE OF SERVICE

I certify that on September 29, 2016, I caused a true and correct copy of the foregoing *Defendant Group Health Incorporated's Unopposed Motion to Extend Page Limitations on Supporting Brief* to be filed using the Court's Electronic Filing System ("ECF System"). The document is available for viewing and downloading via the ECF System, and will be served by operation of the ECF System upon all counsel of record.

	/s/	Peter	Н.	LeVan,	Jr.
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